



THE CITY OF NEW YORK
LAW DEPARTMENT

JAMES E. JOHNSON
Corporation Counsel

100 CHURCH STREET
NEW YORK, NY 10007

VALERIE E. SMITH
Senior Counsel
Phone: (212) 356-2398
Fax: (212) 356-3509
vsmith@law.nyc.gov

March 2, 2020

BY ECF

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Anthony House v. City of New York, et al.
18-CV-6693 (PAE)

Your Honor:

I am a Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, the attorney assigned to represent defendants City of New York and the Department of Correction (“City Defendants”) in the above-referenced matter. City Defendants write to respectfully request permission to file their Response to Plaintiff’s Counterstatement pursuant to Local Civil Rule 56.1 under seal.

On February 18, 2020, the Court granted plaintiff’s application to file his Counterstatement of Material Facts pursuant to Local Civil Rule 56.1 under seal. *See* ECF No. 91. City Defendant’s response to Plaintiff’s Counterstatement incorporates information that has been deemed Confidential pursuant to the Protective Order endorsed by the Court on October 23, 2019. *See* ECF No. 64. Redacted versions of this document will be filed on ECF. In accordance with Your Honor’s Individual Rules, the unredacted version of this document will be provided with the courtesy copy of the motion papers which will be sent to the Court. Additionally, City Defendants will serve plaintiff and co-defendant Seepaul with an unredacted copy of this document.

As such, City Defendants respectfully requests that the Court grant permission to file the above-mentioned document under seal. Further, in the event the Court grants the instant request, unredacted copy of this document with the proposed redactions highlighted will be sent via e-mail to the Court for review. This request is made with the consent of all parties.

Thank you for consideration of the matter herein.

Respectfully submitted,



Valerie E. Smith
Senior Counsel
Special Federal Litigation Division

cc:

Via ECF

Devon Radlin Esq.
Attorney for Plaintiff

Sonia Chazen Esq.
Attorney for Co-defendant Seepaul

3/2/2020

Granted. The Court has reviewed, and approves of, the proposed redactions.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge